

EXHIBIT A

FILED DISTRICT COURT
Third Judicial District

JAN 13 2025

Salt Lake County

Bryan K Hawker
Address for Plaintiff
8928 S. Black Pine St.
West Jordan, Utah 84088

By: _____ Deputy Clerk
If you do not respond to this document within applicable time limits, judgment could be entered against you as requested.

Pro Se

IN THE THIRD JUDICIAL DISTRICT COURT
SALT LAKE COUNTY, STATE OF UTAH

BRYAN K. HAWKER, an individual,

Plaintiff,

v.

TRANSUNION LLC; and DOES 1
through 5, inclusive,

Defendants.

SUMMONS

Civil No. 250900247

Judge: Adam Mow

THE STATE OF UTAH TO THE FOLLOWING DEFENDANT(S):

TRANSUNION LLC

You are summoned and required to answer the attached Complaint that has been filed against you. Within 21 days after service of this summons, you must file your written answer with the clerk of the court at the following address: Matheson Courthouse 450 South State St., P.O. Box 1860, Salt Lake City, UT 84114-1860, and you must mail a copy to the address listed below. If you fail to do so, judgment by default may be taken against you for the relief demanded in the Complaint. The Complaint is attached hereto.

DATED this 13 day of January 2025.


Bryan K. Hawker
Pro se

Address for Plaintiff
8928 S. Black Pine St.
West Jordan, Utah 84088

Served for Jay Weaver
Private Investigator G102341
PO Box 538 Sandy, UT 84091
801-571-7211
Date Served 1/17/25
Time Served 10:53
By [Signature]

Bilingual Notice to Responding Party for In-State Summons (for compliance with URCP 4)

A lawsuit has been filed against you. You must respond in writing by the deadline for the court to consider your side. The written response is called an Answer.

Deadline!

Your Answer must be filed with the court and served on the other party **within 21 days** of the date you were served with this Summons.

If you do not file and serve your Answer by the deadline, the other party can ask the court for a default judgment. A default judgment means the other party can get what they asked for, and you do not get the chance to tell your side of the story.

Read the complaint/petition

The Complaint or Petition has been filed with the court and explains what the other party is asking for in their lawsuit. Read it carefully.

Answer the complaint/petition

You must file your Answer in writing with the court **within 21 days** of the date you were served with this Summons. You can find an Answer form on the court's website: utcourts.gov/ans



Scan QR code
to visit page

Serve the Answer on the other party
You must email, mail or hand deliver a

Se ha presentado una demanda en su contra. Si desea que el juez considere su lado, deberá presentar una respuesta por escrito dentro del periodo de tiempo establecido. La respuesta por escrito es conocida como la Respuesta.

¡Fecha límite para contestar!

Su Respuesta debe ser presentada en el tribunal y también con la debida entrega formal a la otra parte **dentro de 21 días** a partir de la fecha en que usted recibió la entrega formal del Citatorio.

Si usted no presenta una respuesta ni hace la entrega formal dentro del plazo establecido, la otra parte podrá pedirle al juez que asiente un fallo por incumplimiento. Un fallo por incumplimiento significa que la otra parte recibe lo que pidió, y usted no tendrá la oportunidad de decir su versión de los hechos.

Lea la demanda o petición

La demanda o petición fue presentada en el tribunal y ésta explica lo que la otra parte pide. Léala cuidadosamente.

Cómo responder a la demanda o petición

Usted debe presentar su Respuesta por escrito en el tribunal **dentro de 21 días** a partir de la fecha en que usted recibió la entrega formal del Citatorio. Puede encontrar el formulario para la presentación de la Respuesta en la página del tribunal: utcourts.gov/ans-span



Para acceder esta página
escanee el código QR

Entrega formal de la respuesta a la otra parte

Bilingual Notice to Responding Party for In-State Summons (for compliance with URCP 4)

copy of your Answer to the other party (or their attorney or licensed paralegal practitioner, if they have one) at the address shown at the top left corner of the first page of this Summons.

Usted deberá enviar por correo electrónico, correo o entregar personalmente una copia de su Respuesta a la otra parte (o a su abogado o asistente legal, si tiene) a la dirección localizada en la esquina izquierda superior de la primera hoja del citatorio.

Finding help

The court's Finding Legal Help web page

(utcourts.gov/help)

provides information about the ways you can get legal help, including the Self-Help Center, reduced-fee attorneys, limited legal help and free legal clinics.



Scan QR code
to visit page

Cómo encontrar ayuda legal

Para información sobre maneras de obtener ayuda legal, vea nuestra página de Internet Cómo

Encontrar Ayuda Legal.

(utcourts.gov/help-span)

Algunas maneras de obtener ayuda legal son por medio de una visita a un taller jurídico gratuito, o mediante el Centro de Ayuda. También hay ayuda legal a precios de descuento y consejo legal breve.



Para acceder esta página
escanee el código QR



بالإضافة إلى
الرمز QR
الصفحة لزيارة

An Arabic version of this document is available on the court's website:

نسخة عربية من هذه الوثيقة على موقع المحكمة على الإنترنت: وجد

utcourts.gov/arabic

A Simplified Chinese version of this document is available on the court's website:

本文件的简体中文版可在法院网站上找到：

utcourts.gov/chinese



请扫描QR码访问
网页

A Vietnamese version of this document is available on the court's website:

Một bản tiếng Việt của tài liệu này có sẵn trên trang web của tòa:

utcourts.gov/viet



Xin vui lòng quét mã
QR (Trả lời nhanh) để
viếng trang

FILED DISTRICT COURT
Third Judicial District

JAN 13 2025

Salt Lake County

By: _____ Deputy Clerk

Bryan K Hawker
Address for Plaintiff
8928 S. Black Pine St.
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Pro Se

**IN THE THIRD JUDICIAL DISTRICT COURT
SALT LAKE COUNTY, STATE OF UTAH**

BRYAN K. HAWKER, an individual,

Plaintiff,

v.

TRANSUNION LLC; and DOES 1
through 5, inclusive,

Defendants.

COMPLAINT

Civil No. 250900247

Judge: Adam Mow

Plaintiff, Bryan K. Hawker, pro se, hereby complains against Defendant TransUnion, LLC and Does 1-5, inclusive (collectively all "Defendants"), and alleges as follows:

INTRODUCTION

This action is brought by Plaintiff, an individual with whom with Defendant TransUnion, LLC, a credit reporting agency, reported inaccurate and unverified credit information regarding Plaintiff and upon written requests by Plaintiff, failed to investigate or respond to written requests pursuant to state and federal credit reporting laws. Plaintiff has incurred financial damages as a direct result of Defendant TransUnion, LLC's intentional negligence by failing to investigate, verify and respond to Plaintiff's numerous requests.

PARTIES

1. Plaintiff is a resident of West Jordan, Utah, located in Salt Lake County.
2. Defendant TransUnion LLC (“TransUnion”) is an American multinational consumer credit reporting agency headquartered in Chicago, Illinois.
3. Defendant TransUnion is one of the three largest consumer credit reporting agencies, which collects and aggregates information on over 200 million individual consumers and more than 65 million businesses worldwide.
4. In addition to credit and demographic data and services to business, TransUnion sells credit monitoring and fraud prevention services directly to consumers.
5. Defendant TransUnion operates and conducts business in Utah.
6. Does 1-5 represent Defendants that are unknown at the time of filing this complaint but may be liable for damages alleged herein.

JURISDICTION, VENUE AND TIER

7. This is a civil case with subject matter jurisdiction being conferred upon the Court by Utah Code Ann. § 78A–5–102(2).
8. Venue is proper under Utah Code Ann. § 78B–3–307 and § 78B–3–205.
9. Based on the damages alleged by Plaintiff in this action, notwithstanding any punitive damages which might be assessed, this matter qualifies for Tier 1 discovery.

GENERAL ALLEGATIONS

10. Plaintiff refers to and incorporates by reference the preceding paragraphs as if fully set forth herein.

11. In early 2024, while reviewing his credit status, Plaintiff noticed a significant drop in his credit score, as reported by TransUnion.

12. Upon further review, Plaintiff observed numerous items that contained negative treatment of claims, as reported by TransUnion.

13. Many of the negative claims reported by TransUnion were either unsubstantiated, unverified, or simply incorrect.

14. Plaintiff, recognizing the errors being reported by TransUnion, sent written correspondence to TransUnion on or about 7/19/2024 questioning and disputing claims being reported and given negative treatment. *See* First Letter to TransUnion, attached hereto as “Exhibit A.”

First Letter

15. Plaintiff, in his first correspondence to TransUnion, began by attempting to clarify an error with an address reported, one that was contained within a list of addresses believed to be known addresses of Plaintiff, but one which Plaintiff had actually never resided.

16. Next, Plaintiff identified eight (8) accounts that he disputed due to the information being either incorrect, invalid, or containing mistakes. The eight accounts stem from the following vendors:

- | | |
|---------------------------------|---------------------------------|
| • Ford Motor Company | • Pentagon Federal Credit Union |
| • Ford Motor Company | • Sheffield Financial |
| • Navy Federal Credit Union | • Pentagon Federal Credit Union |
| • Pentagon Federal Credit Union | • Bank of the West |

17. Then, Plaintiff identified and disputed the following collection accounts that were deemed to be in error.

- Portfolio Recovery
- Portfolio Recovery
- LVNV Funding LLC
- LVNV Funding LLC
- Paramount Recovery Services

18. Plaintiff, in sending the first letter to TransUnion, was careful to use his current address, one by which TransUnion recognized to be Plaintiff's current address.

19. Plaintiff sent the first letter to TransUnion via certified mail. See “Exhibit A.”

20. The first letter to TransUnion was received on 7/24/2024 by an individual known to be an employee of TransUnion.

21. Plaintiff never received any response to his first letter to TransUnion requesting to have the information reviewed and verified.

Second Letter

22. Plaintiff, determined to contact TransUnion regarding the errors being reported by TransUnion, sent his second written correspondence to TransUnion on or about 10/29/2024, again questioning and disputing claims being reported and given negative treatment. *See* Second Letter to TransUnion, attached hereto as “Exhibit B.”

23. The second letter to TransUnion referenced the prior first letter sent, which had been sent on 7/19/2024 and received on 7/24/2024, again by an employee of TransUnion. *See* “Exhibit B.”

24. Plaintiff never received a response to his second letter to TransUnion requesting to have the information reviewed and verified.

Third Letter

25. At this juncture, Plaintiff sought relief through legal counsel, who, on limited representation, prepared and sent a third letter to TransUnion regarding the matter. *See* Third Letter to TransUnion, attached hereto as “Exhibit C.”

26. The third letter to TransUnion, prepared and sent by counsel, was titled “Notice of Dispute; Notice of Intent to Sue.”

27. The third letter to TransUnion referenced and outlined everything contained in the first and second letters.

28. Further, it identified the eight (8) accounts that Plaintiff disputed due to the information being either incorrect, invalid, or containing mistakes.

29. The third letter also identified and disputed collection accounts that were deemed to be in error.

30. The third letter to TransUnion was sent by counsel on 12/12/2024, and referenced a 15-day period, after receipt of the letter, for TransUnion to respond and/or remove the negative reporting to Plaintiff’s credit.

31. Well more than 15-days has passed and TransUnion has failed to remove the negative reporting and/or to respond to counsel’s third letter sent.

32. Counsel’s letter to TransUnion included an email to which counsel could be reached, should the expiration of time had become an issue.

33. To date, counsel has neither received a written response by regular mail nor a response by email from TransUnion.

CLAIM FOR RELIEF

34. Plaintiff refers to and incorporates by reference the preceding paragraphs as if fully set forth herein.

35. The Fair Credit Reporting Act (FCRA), 15 U.S.C. § 1681, is a federal law that regulates the consumer reporting industry.

36. The FCRA's purpose is to ensure that consumer information is reported accurately, fairly, and in a timely manner.

37. The FCRA also protects the privacy of personal information collected by consumer reporting agencies (CRAs).

38. TransUnion clearly fits into the consumer reporting industry to which the Act intends to regulate and protect consumers.

39. In addition to strict federal laws protecting consumers from inaccurate and unverified reporting, states have also enacted laws or promulgated rules intended to protect consumer from the same unfair or inequitable treatment as the federal law.

40. Under Utah Admin. Code R152-21, a rule that governs credit services organizations, sets forth consumer protections and clearly defines the types of misreporting and mistreatment that the rule intends to protect consumers from.

Utah Admin. Code R152-21-3 - Definitions

(1) "Challenge" means any act performed by a credit services organization to dispute an entry appearing on the buyer's credit report.

(2) "Credit report" means any document prepared by a credit reporting agency used to demonstrate a buyer's credit-worthiness, credit standing, or credit capacity.

(3) "Inaccurate information" means data that includes a typographical error or similar clerical or technical fault that creates reasonable doubt about the data's reliability.

(4) "Material error" means false or misleading information on a buyer's credit report that could reasonably affect a decision to extend or deny credit to the buyer.

(5) "Material omission" means information that: (a) should appear on a buyer's credit report but does not; and (b) could reasonably affect a decision to extend or deny credit to the buyer.

(6) "Outdated information" means information that, in accordance with state or federal law, should not appear on the buyer's credit report because of its age.

(7) "Unverifiable information" means an entry on a credit report that lacks supporting evidence sufficient to convince a reasonable person that the entry is proper.

41. By failing to respond to three (3) letters sent by Plaintiff and proven to be received by TransUnion, Defendant TransUnion has failed to follow the protections set forth in both federal law and state administrative rules.

42. Therefore, TransUnion has committed intentional negligence by failing to review, correct, or respond to Plaintiff's inquiries.

43. Plaintiff has incurred monetary damages in the form of bad credit, no credit, denied loans and credit applications, as well as demonstrated intentional negligence by not properly reporting, investigating, or addressing disputes.

PRAYER FOR RELIEF

WHEREFORE, the time for TransUnion to respond has now passed and Plaintiff has incurred, and continues to incur, damages as a result of TransUnion's failure to follow requirements and procedures as set forth in federal and state law. Plaintiff demands judgment against Defendant for damages as follows:

- A. Intentional Negligence by TransUnion in its failure to investigate and respond to three (3) letter and requests from Plaintiff. For judgment against TransUnion in the form of credit repair, monetary compensation and damages incurred by

Plaintiff as a result of TransUnion's failure, and punitive damages or fines against TransUnion as the court sees fit to award.

- B. For all attorney fees, court costs, and other amounts leading up to and spent in bringing this action.
- C. Under all claims for relief, for such other and further relief as the Court deems appropriate.

DATED this 13 day of January 2025.



Bryan K. Hawker
Pro se

Address for Plaintiff
8928 S. Black Pine St.
West Jordan, Utah 84088

EXHIBIT A

Bryan Hawker
8928 Black Pine Street
West Jordan, UT 84088
[REDACTED]

Date 07/10/2024

TO: TransUnion
P.O. Box 1000
Chester, PA 19002

RE: Disputed Information Below:

TransUnion, all the following items I have disputed in full, please investigate these accounts and send back your results within the 30 days which is allowed by law.

1. Address Reported: I dispute the following address 5905 Zina Circle West Valley, Utah 82128. I HAVE NEVER LIVED AT THIS ADDRESS OR EVER ASSOCIATED WITH THIS ADDRESS. (Remove this from my credit profile. This is incorrect information and according to State and Federal Law this needs to be removed.)
 2. Address Reported: I dispute the following address 3339 North 175 West OGDEN UT, 84414. I HAVE NEVER LIVED AT THIS ADDRESS OR EVER ASSOCIATED WITH THIS ADDRESS. (Remove this from my credit profile. This is incorrect information and according to State and Federal Law this needs to be removed.)
-

3. Account 1. Navy Federal Credit Union: I dispute this entire account in full. I dispute the payment history in full: I have never been late on any payments to Navy Federal Credit Union. Please respond with the following:

Person Contacted _____ Phone Number _____ Date _____

4. Account 2. Ford Motor Company CO: I dispute this entire account in full. I dispute the payment history in full: I have never been late on any payments to Ford Motor Company. Please respond with the following:

Person Contacted _____ Phone Number _____ Date _____

5. Account 3. Ford Motor Company CO: I dispute this entire account in full. I dispute the payment history in full: I have never been late on any payments to Ford Motor Company. Please respond with the following:

Person Contacted _____ Phone Number _____ Date _____

6. Account 4. Navy federal Credit Union: I dispute this entire account in full. I dispute the payment history in full: No payments have ever been late Navy Federal Credit Union. Please respond with the following:

Person Contacted _____ Phone Number _____ Date _____

7. Account 1. I dispute this entire account in full. Pentagon Federal Credit Union: I dispute the payment history in full: I have never been late on any payments to Pentagon Federal Credit Union. Please respond with the following:

Person Contacted _____ Phone Number _____ Date _____

8. Account 2. Pentagon Federal Credit Union: I dispute this entire account in full. I dispute the payment history in full: I have never been late on any payments to Pentagon Federal Credit Union. Please respond with the following:

Person Contacted _____ Phone Number _____ Date _____

9. Account 3. Pentagon Federal Credit Union: I dispute this entire account in full. I dispute the payment history in full: I have never been late on any payments to Pentagon Federal Credit Union. Please respond with the following:

Person Contacted _____ Phone Number _____ Date _____

10. Elan Fin Services: I dispute this entire account in full. I dispute the payment history in full: I have never been late on any payments to Elan Fin Services. Please respond with the following:

Person Contacted _____ Phone Number _____ Date _____

11. FST PROGRESS: I dispute this entire account in full. I dispute the payment history in full: I have never been late on any payments to FST PROGRESS. Please respond with the following:

Person Contacted _____ Phone Number _____ Date _____

12. GREENDOTBANK: I dispute this entire account in full. I dispute the payment history in full: I have never been late on any payments to GREENDOTBANK. Please respond with the following:

Person Contacted _____ Phone Number _____ Date _____

13. MERRICK BK: I dispute this entire account in full. I dispute the payment history in full: I have never been late on any payments to MERRICK BK. Please respond with the following:

Person Contacted _____ Phone Number _____ Date _____

14. NORDSTM/TD: I dispute this entire account in full. I dispute the payment history in full: I have never been late on any payments to NORDSTM/TD. Also, have no knowledge of TD whoever they are. Please respond with the following:

Person Contacted _____ Phone Number _____ Date _____

15. MERRICK BK: I dispute this entire account in full. I dispute the payment history in full: I have never been late on any payments to MERRICK BK. Please respond with the following:

Person Contacted _____ Phone Number _____ Date _____

16. SEC SVC FCU: I dispute this entire account in full. I have no knowledge of this account. Please respond with the following:

Person Contacted _____ Phone Number _____ Date _____

17. KOVO: I dispute this entire account in full. I dispute the payment history in full: I have never been late on any payments to KOVO. Please respond with the following:

Person Contacted _____ Phone Number _____ Date _____

18. TRUIST: I dispute this entire account in full. I dispute this entire account in full. I have no knowledge of this account TRUIST. Please respond with the following:

Person Contacted _____ Phone Number _____ Date _____

Please Respond to the following Collection Accounts:

1. ABSRES INV: I have no knowledge of this account. Please investigate and remove it from my credit report.

Person Contacted _____ Phone Number _____ Date _____

2. Portfolio Recovery: I have no knowledge of this account. Please investigate and remove it from my credit report.

Person Contacted _____ Phone Number _____ Date _____

3. Portfolio Recovery: I have no knowledge of this account. Please investigate and remove it from my credit report.

Person Contacted _____ Phone Number _____ Date _____

4. LVNV Funding LLC: I have no knowledge of this account. Please investigate and remove it from my credit report.

Person Contacted _____ Phone Number _____ Date _____

5. LVNV Funding LLC: I have no knowledge of this account. Please investigate and remove it from my credit report.

Person Contacted _____ Phone Number _____ Date _____

6. Paramount Recovery Services: I have no knowledge of this account. Please investigate and remove it from my credit report.

Person Contacted _____ Phone Number _____ Date _____

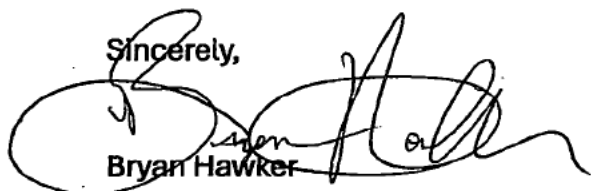
1. ASNY: I have no knowledge of this account. Please investigate and remove it from my credit report.

Person Contacted _____ Phone Number _____ Date _____

This information must be investigated and respond to me directly with the appropriate information as requested above. If you fail to respond to this information, it must be deleted from my credit profile. If you fail to do so **TransUnion** will be liable for every account according to State and Federal Laws not to exceed \$5000 per account. **TransUnion** will be liable for damages as well.

Look forward to your response,

Sincerely,


Bryan Hawker

U.S. Postal ServiceTM
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com

Chester, PA 19018

OFFICIAL USE

Certified Mail Fee \$4.85

Extra Services & Fees (check box, add fee as appropriate)

☐ Return Receipt (hardcopy) \$0.00

☐ Return Receipt (electronic) \$0.00

☐ Certified Mail Restricted Delivery \$0.00

☐ Adult Signature Required \$0.00

☐ Adult Signature Restricted Delivery \$0.00

Postage \$0.73

Total Postage and Fees \$5.58

Sent To **TransUnion**

Street and Apt. No., or PO Box No. **P.O. Box 1000**

City, State, ZIP+4® **Chester PA 19022**

PS Form 3800, April 2015 PSN 7530-02-000-9057 See Reverse for Instructions

7021 2720 0003 4314 8431

22*0\$ 0780 05

Postmark Here

JUL 15 2024

07/15/2024

58*4\$

Chester, PA 19018

SENDER: COMPLETE THIS SECTION

■ Complete items 1, 2, and 3.
■ Print your name and address on the reverse so that we can return the card to you.
■ Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

TransUnion
P.O. Box 1000
Chester, PA 19022

9590 9402 6287 0274 2179 89

Article Number (Transfer from service label)

7021 2720 0003 4314 8431

PS Form 3811, July 2020 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature ☐ Agent ☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes ☐ No
If YES, enter delivery address below:

3. Service Type

☐ Adult Signature ☐ Priority Mail Express®

☐ Adult Signature Restricted Delivery ☐ Registered MailTM

☐ Certified Mail ☐ Registered Mail Restricted Delivery

☐ Certified Mail Restricted Delivery ☐ Signature ConfirmationTM

☐ Collect on Delivery ☐ Signature Confirmation Restricted Delivery

☐ Collect on Delivery Restricted Delivery

Domestic Return Receipt

BY AIRMAIL
Date
TransUnion

USPS Tracking®

FAQs >

Tracking Number:

Remove X

70212720000343148431

Copy

Add to Informed Delivery (<https://informedelivery.usps.com/>)

Latest Update

Your item arrived at the Post Office at 8:32 am on July 20, 2024 in CHESTER, PA 19013.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Preparing for Delivery

● Arrived at Post Office

CHESTER, PA 19013

July 20, 2024, 8:32 am

● Arrived at USPS Regional Destination Facility

PHILADELPHIA PA DISTRIBUTION CENTER

July 18, 2024, 9:45 pm

● See All Tracking History

Feedback

What Do USPS Tracking Statuses Mean? (<https://faq.usps.com/s/article/Where-is-my-package>)

Text & Email Updates



USPS Tracking Plus®



Product Information



See Less ^

Track Another Package

Enter tracking or barcode numbers

Need More Help?

Contact USPS Tracking support for further assistance.

[FAQs](#)

EXHIBIT B

Bryan Hawker
8928 Black Pine Street
West Jordan, UT 84088
[REDACTED]

Date 10/25/2024

TO: TransUnion
P.O. Box 1000
Chester, PA 19022

TO: Utah State Attorney General Office
350 North State Street Suite 230
SLC UT 84114-2320

TO: ATTORNEY KEITH N HAMILTON
TO: ATTORNEY MATTHEW K BROADBENT

RE: Disputes Sent on July 15, 2024

To Whom It May Concern:

I sent a detailed dispute to **TransUnion** on July 19, 2024, it was received on July 24, 2024, and signed by Alfredo Hewitt Agent or employee of **TransUnion**. Please see attachment A. I disputed all inaccurate information as follows in my credit report. Utah Law states all information disputed must be removed from my credit profile within 30 days, because you failed to answer any of my disputes.

TransUnion failed to respond to any of my disputes, I followed all laws and sent everything certified mail with the following tracking number (USPS TRACKING 7021 2720 0003 8431 9094) and signed by Alfredo Hewitt Agent or employee of **TransUnion**.

If you fail to remove said information, **TransUnion** will be liable for each disputed account on my credit profile in the amount of not less than \$1,000 but no more than \$5,000 per account. **Per Utah State Law.**

The following item according to Utah State Law are as follows: Utah Code R152-21-3

Section R152-21-3 - Definitions

(1) "Challenge" means any act performed by a credit services organization to dispute an entry appearing on the buyer's credit report.

(2) "Credit report" means any document prepared by a credit reporting agency used to demonstrate a buyer's creditworthiness, credit standing, or credit capacity.

(3) "Inaccurate information" means data that includes a typographical error or similar clerical or technical fault that creates reasonable doubt about the data's reliability.

(4) "Material error" means false or misleading information on a buyer's credit report that could reasonably affect a decision to extend or deny credit to the buyer.

(5) "Material omission" means information that: (a) should appear on a buyer's credit report but does not; and (b) could reasonably affect a decision to extend or deny credit to the buyer.

(6) "Outdated information" means information that, in accordance with state or federal law, should not appear on the buyer's credit report because of its age.

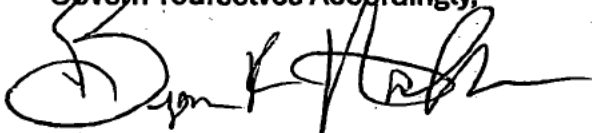
(7) "Unverifiable information" means an entry on a credit report that lacks supporting evidence sufficient to convince a reasonable person that the entry is proper.
Utah Admin. Code R152-21-3

I have spoken with Attorney Keith N Hamiton as well as Matthew K Broadbent about this matter, I also have contacted the Utah State Attorney General's Office, they are ready to pursue this matter if necessary.

I will give **TransUnion** the required 30 days through State and Federal Laws to remove all disputed information attached to this letter that was certified to **TransUnion** and signed by Alfredo Hewitt Agent or employee of **TransUnion** on July 25, 2024.

I will require **TransUnion** to notify me by mail before the 30 days required by law. If **TransUnion** fails to do so I will be filing with all legal entities as listed above.

Govern Yourselves Accordingly,

A handwritten signature in black ink, appearing to read 'Bryan K Hawker', with a stylized flourish at the end.

Bryan K Hawker



WASHINGTON
25 W TELEGRAPH ST
WASHINGTON, UT 84780-8010
(800)275-8777

11/08/2024

02:46 PM

Product	Qty	Unit Price	Price
First-Class Mail®	1		\$2.59
Large Envelope			
Chester, PA 19016			
Weight: 0 lb 4.80 oz			
Estimated Delivery Date			
Thu 11/14/2024			
Certified Mail®			\$4.85
Tracking #:			
70212720000343149452			
Return Receipt			\$4.10
Tracking #:			
9590 9402 6287 0274 2180 85			
Total			\$11.54

Grand Total: \$11.54

Cash \$20.00
Change -\$8.46

Text your tracking number to 28777 (2USPS) to get the latest status. Standard Message and Data rates may apply. You may also visit www.usps.com USPS Tracking or call 1-800-222-1811.

Preview your Mail
Track your Packages
Sign up for FREE @
<https://informedelivery.usps.com>

All sales final on stamps and postage.
Refunds for guaranteed services only.
Thank you for your business.

Tell us about your experience.
Go to: <https://postalexperience.com/Pos>
or scan this code with your mobile device.



or call 1-800-410-7420.

U.S. Postal Service™ CERTIFIED MAIL® RECEIPT Domestic Mail Only

For delivery information, visit our website at www.usps.com

Chester, PA 19016

OFFICIAL USE

Certified Mail Fee \$4.85

Extra Services & Fees (check box, add fee)

☐ Return Receipt (hardcopy) \$3.00

☐ Return Receipt (electronic) \$0.00

☐ Certified Mail Restricted Delivery \$0.00

☐ Adult Signature Required \$0.00

☐ Adult Signature Restricted Delivery \$0.00

Postage \$2.59

Total Postage and Fees \$11.54

Sent To

TransUnion

P.O. Box 1000

Chester, PA 19022

PS Form 3800, April 2015 PSN 7530-02-000-9053

See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:

TransUnion
P.O. Box 1000
Chester, PA 19022
19016



9590 9402 6287 0274 2180 85

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *Asell Anglen*

B. Received by (Printed Name) C. Date

D. Is delivery address different from item 1? ☐
If YES, enter delivery address below: ☐

3. Service Type

☐ Adult Signature ☐ Priority Mail

☐ Adult Signature Restricted Delivery ☐ Registered Mail

☐ Certified Mail ☐ Registered Mail Delivery

☐ Certified Mail Restricted Delivery ☐ Signature Confirmation

☐ Collect on Delivery ☐ Signature Confirmation Restricted Delivery

☐ Collect on Delivery Restricted Delivery ☐ Restricted Delivery

☐ All Restricted Delivery

S Form 3811, July 2020 PSN 7530-02-000-9053

Domestic Return

UFN: 499418-0780

Receipt #: 840-58400198-3-6870613-2

Clerk: 26

Bryan Hawker
8928 Black Pine Street
West Jordan, Utah 84088



7021 2720 0003 4314 9452

Retail



19018

RDC 99

U.S. POSTAGE PAID
FCM LG ENV
WASHINGTON, UT 84180
NOV 08, 2024

\$11.54

R2305K131858-28

TransUnion
P.O. Box 1000
Chester, PA 19022

10/15/24

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ALERT: EFFECTIVE NOVEMBER 29, 2024, INTERNATIONAL MAIL SERVICE TO CANADA IS TEM...

USPS Tracking®

FAQs >

Tracking Number:

Remove X

70212720000343149452

Copy

Add to Informed Delivery (<https://informedelivery.usps.com/>)

Latest Update

Your item was picked up at a postal facility at 1:40 pm on November 14, 2024 in CHESTER, PA 19013.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Delivered

Delivered, Individual Picked Up at Postal Facility

CHESTER, PA 19013

November 14, 2024, 1:40 pm

See All Tracking History

What Do USPS Tracking Statuses Mean? (<https://faq.usps.com/s/article/Where-is-my-package>)

Text & Email Updates



USPS Tracking Plus®



Product Information



See Less ^

Track Another Package



Feedback

Enter tracking or barcode numbers

Need More Help?

Contact USPS Tracking support for further assistance.

FAQs

EXHIBIT C

Matthew K. Broadbent-Attorney at Law

December 5, 2024

TransUnion LLC
P.O. Box 805
Woodlyn, PA 19094-0805

TransUnion
P.O. Box 2000
Chester, PA 19016

TransUnion
P.O. Box 1000
Chester, PA 19016

Utah Attorney General's Office
350 North State Street
Suite 230
Salt Lake City, UT 84114-2320

Utah Dept of Financial Institutions
P.O. Box 146800
Salt Lake City, UT 84114-6800

Division of Consumer Protection
State of Utah Department of
Commerce
PO Box 146704
Salt Lake City, UT 84114-6704

NOTICE OF DISPUTE; NOTICE OF INTENT TO SUE

**Re: TransUnion Improper Reporting, Failure to Follow Proper
Procedures, Failure to Comply with Utah Law**

To TransUnion and Other Parties With Whom This May Concern:

I am representing Mr. Hawker as legal counsel in this matter concerning the negative treatment of claims that were reported, and continue to appear, on his credit report. As you can imagine, negative reporting to one's credit report can have devastating effects on one's credit score, purchasing power and many other aspects in life where credit scores are taken into consideration. In Mr. Hawker's situation, many of the negative claims were either unsubstantiated, unverified, or simply incorrect.

Under general credit reporting rules, an individual ("debtor") can question or dispute claims that were reported and given negative treatment. Mr. Hawker sent written correspondence to TransUnion on or about 7/19/2024 identifying specific

accounts and disputing them in full. ***TransUnion did not respond within 30 days,*** nor did they respond at all to the request. Mr. Hawker reached out a second time and sent written correspondence to TransUnion through certified mail, which was delivered on 11/5/2024 and received the next day by James McKellar, presumably an agent for TransUnion. See attached documents.

In his correspondence, Mr. Hawker first clarified an error with an address where he had never resided. Then, he identified eight accounts that he disputed due to the information being either incorrect, invalid or containing mistakes. The eight accounts stem from the following vendors:

- Ford Motor Company
- Ford Motor Company
- Navy Federal Credit Union
- Pentagon Federal Credit Union
- Pentagon Federal Credit Union
- Sheffield Financial
- Pentagon Federal Credit Union
- Bank of the West

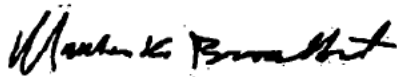
Mr. Hawker also identified and disputed the following collection accounts that he deemed to be in error.

- Portfolio Recovery
- Portfolio Recovery
- LVNV Funding LLC
- LVNV Funding LLC
- Paramount Recovery Services

Mr. Hawker never received any response to his two (2) requests to have the information reviewed and verified. The only conclusion can be that TransUnion did not review the foregoing accounts and collection accounts. The time for TransUnion to respond has now passed and Mr. Hawker has incurred, and continues to incur, damages as a result of TransUnion's failure to follow requirements and procedures as set forth in state and federal law.

Mr. Hawker is asking for the immediate removal of negative reporting by TransUnion on the foregoing accounts and collection accounts within 15 days of the receipt of this letter. Should there be no response or action by TransUnion, Mr. Hawker will move forward in seeking damages and relief in this matter.

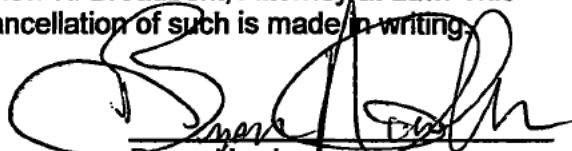
Best regards,



Matthew K. Broadbent
Attorney at Law
matt@consultingalliancegroupinc.com

As an attorney representing Mr. Hawker, I'm authorized to discuss such matters as the damages associated with it. You will note the following authorization signed by Mr. Hawker and it should be retained as part of your record.

I, **Bryan Hawker**, authorize the release of any, and all information, written or otherwise, pertaining to my claim with TransUnion and matters associated with the claim(s), and to do so both verbally and in writing, to Matthew K. Broadbent, Attorney at Law. This authorization shall remain in place until cancellation of such is made in writing.



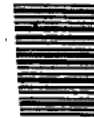
Bryan Hawker

Bryan Hawker
8928 Black Pine Street
West Jordan, Utah 84088



7021 2720 0003 4314 9483

U.S. POSTAGE PAID
FCM LG ENV
HURRICANE, UT 84737
DEC 12, 2024
\$11.26
S2323W501068-02



19016

Retail



RDC 99

TransUnion
P.O. Box 1000
Chester, PA 19016

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

TransUnion
P.O. Box 1000
Chester, PA 19022



9590 9402 6287 0274 2181 15

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery


D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery
- ☐ Mail Restricted Delivery

- ☐ Priority Mail®
- ☐ Registered Mail®
- ☐ Signature Confirmation®
- ☐ Signature Confirmation Restricted Delivery

7021 2720 0003 4314 9483

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p style="text-align: center;">TransUnion P.O. Box 1000 Chester, PA 19022</p>  <p style="text-align: center;">9590 9402 6287 0274 2181 15</p> <p>2. Article Number (Transfer from sending label)</p> <p style="text-align: center;">7021 2720 0003 4314 9483</p>	<p>A. Signature</p> <p>TransUnion</p> <p>Date Received by (Printed Name) <input type="checkbox"/> Agent By <input type="checkbox"/> Addressee</p> <p>Is delivery address different from item 1? <input type="checkbox"/> Yes If yes, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Mail Restricted Delivery (over \$500)</p>
PS Form 3811, July 2020 PSN 7530-02-000-9053	

Domestic Return Receipt

U.S. Postal Service™ - CERTIFIED MAIL® RECEIPT Domestic Mail Only	
For delivery information, visit our website at www.usps.com .	
Chester, PA 19022	
Certified Mail Fee	\$4.85
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00
Postage	\$2.31
Total Postage and Fees	\$11.26
Sent To	TRANS Union
Street and Apt. No. or PO Box No.	P.O. Box 1000
City, State, ZIP+4®	Chester PA 19022
PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions	

ALERT: EFFECTIVE NOVEMBER 29, 2024, INTERNATIONAL MAIL SERVICE TO CANADA IS TEM...

USPS Tracking®

FAQs >

Tracking Number:

Remove X

70212720000343149483

Copy

Add to Informed Delivery (<https://informedelivery.usps.com/>)

Latest Update

Your item was picked up at a postal facility at 10:26 am on December 18, 2024 in CHESTER, PA 19013.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Delivered

Delivered, Individual Picked Up at Postal Facility

CHESTER, PA 19013

December 18, 2024, 10:26 am

See All Tracking History

What Do USPS Tracking Statuses Mean? (<https://faq.usps.com/s/article/Where-is-my-package>)

Text & Email Updates



USPS Tracking Plus®



Product Information



See Less ^

Track Another Package



Feedback

Enter tracking or barcode numbers

Need More Help?

Contact USPS Tracking support for further assistance.

[FAQs](#)